

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

\*

**vs.**

\*

**Case No.: 22-cr-180-TDC**

**NIJEA NICOLE RICH**

\*

**Defendant**

\*

**CONSENT MOTION TO TEMPORARILY MODIFY  
CONDITIONS OF RELEASE**

The Defendant, Nijea Nicole Rich, by and through her attorneys, Nicholas G. Madiou, and Brennan, McKenna & Lawlor, Chtd., respectfully requests that this Honorable Court temporarily modify the conditions of release in this case. In support of this motion, counsel states the following.

1. Ms. Rich is charged by Criminal Indictment with Impersonating a Federal Officer, in violation of Title 18 U.S.C. § 912 and Conspiracy to Commit Offenses Against the Unites States in violation of Title 18 U.S.C. § 371.

2. Ms. Rich is currently under supervision of United States Pretrial Services and placed on a curfew from 7 p.m. to 7 a.m.

3. At this time, Ms. Rich respectfully asks this Court to temporarily modify her conditions of release such that she be permitted to leave her home at 6:00 a.m. on November 16, 2022 to take her dog to a veterinarian appointment at Banfield Pet Hospital located at 597 E. Ordnance Road, Glen Burnie, Maryland 21060.

4. Undersigned counsel contacted Mr. James Ridgway from Pretrial Services and is authorized to state that Pretrial Services has no objection to this request.

5. Undersigned counsel also contacted Assistant United States Attorney, Peter Cooch, who also consents to the requested temporary modification of conditions of release.

6. For these reasons, Ms. Rich respectfully asks this Court temporarily modify her conditions of release such that she be permitted to leave her home at 6:00 a.m. on November 16, 2022 as detailed above.

Respectfully submitted,  
/s/

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Nicholas G. Madiou  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, November 7, 2022, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Maryland.

/s/

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Nicholas G. Madiou